

## Exhibit B

## Scheduled Dates for Witness Depositions

Ref. No.	Custodian	Plts.' Proposed Dates	Uber's Proposed Dates	Current Employee (Y/N)	Uber's Response
1	Anderson, Brooke	Feb. 26, 27 and 28	Mar. 3 or 4	Y	Uber initially proposed March 27 and 28 on December 23, 2024. Plaintiffs did not respond with respect to Ms. Anderson until January 10. Those dates, however, are no longer available and Uber has now offered March 3 and 4 for a coordinated deposition.
2	Breeden, Tracey	Jan. 28 or 29	Feb. 18, 19, 20, 25, 26 and 27.	N	Ms. Breeden has communicated that she is no longer available on January 28 or 29 as Plaintiffs requested. Uber provided the alternative dates of February 25 and 26, which would coordinate with the JCCP deposition already scheduled. Plaintiffs informed Uber on December 29 that Plaintiffs are not available on those dates, without giving further reason. Uber provided additional dates on January 13.
3	Burke, Jordan	Feb. 19, 20 and 21	No date provided to parties yet.	N	Mr. Burke has not yet provided his availability. As a former employee, Uber cannot schedule a deposition on his behalf without his involvement and consent. Defendants will provide an update on whether Paul, Weiss will represent this individual and, if so, his availability for a deposition.

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4	Chang, Frank	Mar. 18, 19 and 26	Uber will provide a placeholder date in May.	Y	The JCCP Court issued a protective order on January 9, 2025, with respect to the JCCP's request to depose Mr. Chang. That order defers Mr. Chang's deposition without prejudice to the JCCP Plaintiffs seeking to lift the protective order following further discovery in March and April. Uber will be seeking similar relief in the MDL proceeding and will provide a deposition placeholder date for a coordinated deposition in May.
5	Cinelli, Dennis	Jan. 23, 30 and 31	Mar. 14, 21, 25 or 28	N	Plaintiffs confirmed March 28.
6	Ding, Abbie	Apr. 1, 2, and 3	Mar. 3-7 Apr. 3, 4, 7 or 8	Y	Plaintiffs confirmed April 3 and 4.  Although Plaintiffs state throughout their PTO 8 letter that Uber is being unreasonable in deposition scheduling, there are quite a few examples, like Ms. Ding and Ms. Shuping (below), where Uber worked directly with Plaintiffs and witnesses to find an optimal date for all parties. Uber has been cooperative in trying to find the best solutions, communicating that to Plaintiffs in the process.
7	Fogg, Chad	March 25, 26, and 27	March 25 April 1-2, 7-8	Y	Plaintiffs confirmed March 25.

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8	Freivogel, Cory	Feb. 4, 5, and 6	Week of April 28 or week of May 12	Y	<p>On September 29, 2024, Plaintiffs confirmed they would participate in Mr. Freivogel's coordinated deposition between the JCCP and MDL, to take place on December 10, 2024.</p> <p>Plaintiffs withdrew from coordinating this deposition on October 14, 2024. Plaintiffs now demand a January or February deposition date.</p> <p>Given Mr. Freivogel was just deposed, it is understandable that he will need to schedule a deposition for a date later than January or February to lessen the burden placed on his schedule of preparing and appearing for a deposition. This is a reasonable request given Plaintiffs agreement, and subsequent withdrawal, to a December deposition.</p>
9	Fuldner, Gus	Jan. 27	March 10, 11 (after 11 am PST), or 17	Y	Plaintiffs confirmed March 10 (all day) and March 11 (after 11am PT) for a coordinated deposition.
10	Graves, Ryan	Mar. 5, 6 and Apr. 1	No date provided to parties yet.	N	Uber anticipates moving for a protective order with respect to Mr. Graves. Mr. Graves has not otherwise provided availability for a deposition.
11	Hawk, Cassie	Feb. 25, 26, or 27	April 8 or 9	Y	Plaintiffs confirmed April 8 or 9.

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12	Henley, Mat	Apr. 10, 15, 16	April 22 or 29 May 6 (placeholder)	N	Uber anticipates moving for a protective order with respect to Mr. Henley. May 6 confirmed as a placeholder.
13	Holt, Rachel	Feb. 6, 10 or 12	April 1 or 9	N	<p>On September 29, Plaintiffs agreed to a coordinated deposition between the JCCP and MDL, to take place on December 12, 2024.</p> <p>Plaintiffs withdrew from coordinating this deposition on October 14, 2024. Ms. Holt's deposition went ahead on December 12, 2024. Plaintiffs now demand a January or February deposition date.</p> <p>Ms. Holt is a former employee who runs a venture capital firm and in that capacity has significant professional commitments throughout February and March as well as personal commitments. Given Ms. Holt was just deposed, it is understandable that she will need to schedule a deposition for a date later than January or February to lessen the burden placed on her schedule of preparing and appearing for a deposition. This is a reasonable request given Plaintiffs' agreement, and subsequent withdrawal, to a December deposition.</p>

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14	Hourdajian, Nairi	Apr. 7, 8, and 11	No date provided	N	Uber is working to establish contact with Ms. Hourdajian and will provide an update on whether Paul, Weiss will represent this individual and, if so, her availability for a deposition.
15	Joyce, Meghan	April 16, 17 and 18	Week of February 24	N	Ms. Joyce has provided availability dates in February, which Uber has communicated to Plaintiffs. Plaintiffs have consistently stated they want February deposition dates of former employees, even if the individuals come from later tranches – Ms. Joyce is a Tranche 4 witness. Uber has attempted to provide this February date to match their demands.

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16	Kaiser, Roger	Jan. 14, 15, and 21	Uber will provide availability upon Mr. Kaiser's return from parental leave	Y	<p>On September 29, 2024, Plaintiffs confirmed they would participate in Mr. Kaiser's coordinated deposition between the JCCP and MDL, to take place on November 19 and 20, 2024.</p> <p>Plaintiffs withdrew from coordinating this deposition on October 14, 2024. Plaintiffs now demand a January or February deposition date.</p> <p>Mr. Kaiser is now on parental leave. However, Mr. Kaiser has stated that he will likely be able to schedule the deposition in April or May. Given Mr. Kaiser's leave and Plaintiffs' agreement, and subsequent withdrawal, to a November deposition, this request by the witness is reasonable.</p>

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17	Kansal, Sachin	Apr. 9, 10, and 11	Uber will provide a placeholder date in May.	Y	The JCCP Court issued a protective order on January 9, 2025, with respect to the JCCP's request to depose Mr. Kansal. That order defers Mr. Kansal's deposition without prejudice to the JCCP Plaintiffs seeking to lift the protective order following further discovery in March and April. Uber will be seeking similar relief in the MDL proceeding and will provide a deposition placeholder date for a coordinated deposition in May.
18	Lake, Carley	Feb. 13	March 20 and 21	N	Uber has offered Mar. 20 and 21 to both the JCCP and MDL for a coordinated deposition.
19	Luu, Jenny	April 3, 4, 10 and 11	Weeks of February 17 or 24	Y	Plaintiffs confirmed February 27.
20	Richter, David	March 29 and 30	February 17 or 24 or March 3, 17, 24 or 31	N	Plaintiffs confirmed March 24.
21	Shuping, Valerie	March 7, 13, 14	March 6 and 7	N	Plaintiffs confirmed March 6 and 7 for a coordinated deposition.